

**OHIO EPA
TIME-CRITICAL REMOVAL ACTION
REFERRAL PACKAGE**

1. Site Location and Responsible Party Information

A. Site Name: Former Plastech Engineered Products, Inc. – Andover Facility

B. Location:
205 Maple Street Extension
Andover, OH 44003
Ashtabula County
Latitude/Longitude: N 41.612554° / W 80.568407°
Parcel ID numbers: 020132000300, 020132000700 and 020132000701
EPA ID number: OHD068896778

C. Site Contacts:

Plastech Engineered Products, Inc. Bankruptcy Liquidating Trustee:
James Carroll
Chief Liquidating Officer
Carroll Services, LLC
4 Mount Royal Ave., Suite 420
Marlboro, MA 01752
(508) 229-3366

Carroll Services, LLC represented by:
Daniel Katlein
2600 Buhl Building
535 Griswold
Detroit, MI 48226-3687
(313) 961-6141

Plastech Engineered Products, Inc. Debtor Representative:
Deborah Fish
2600 Buhl Building
535 Griswold
Detroit, MI 48226-3687
(313) 961-6141

Assets of Plastech-Andover facility, not property, purchased by:
Duane Smith
Trusted Partner, LLC
21845 Kyla Drive
Saegertown, PA 16433
(814) 547-3627

- D. Brief description of steps taken to compel responsible parties to conduct site remediation:

On February 1, 2008, Plastech Engineered Products, Inc. (Plastech) filed for Chapter 11 bankruptcy in the U.S. Bankruptcy Court, Eastern Division of Michigan, petition number 08-42417-pjs. Subsequently, on December 31, 2008, the Bankruptcy Court authorized an order for dissolution of Plastech and its subsidiaries.

In February 2009, Ohio EPA, Division of Materials and Waste Management (DMWM), attempted to work with Trusted Partner LLC, to remove regulated substances. In February 2010, Trusted Partners removed a limited amount of regulated substances. Additionally, on June 15, 2009, Ohio EPA issued a Notice of Violation (NOV) letter to Plastech and James Carroll of Carroll Services LLC, for violations of Ohio's Cessation of Regulated Operations (CRO). No response was received concerning this NOV letter.

Ohio EPA continued to monitor this facility with the intention of working with any prospective buyer of the property to address the outstanding CRO issues.

On June 13, 2012, Ohio EPA conducted an inspection of the facility which revealed regulated substances as paint/solvent, containers labeled as Corrosive and Oxidizer and leaking oil-filled electrical transformers. In addition, the site is unsecured and accessible to the public.

2. Site Description and Background Information

- A. Description of past or present operations and how wastes were generated:

Operations at the Plastech Andover facility included plastic injection molding and painting activities. Hazardous waste generated from painting activities included spent solvent and waste paint characterized as D001/D035/F003/F005. In addition, other wastes included spent spray booth filters, spray booth coating waste and used oil.

Prior to filing for bankruptcy, Plastech removed a majority of the hazardous waste from the facility. However, miscellaneous containers, other regulated substances and oil-filled electrical transformers remained at the facility.

B. Site Characteristics:

The Plastech Andover facility is an abandoned manufacturing complex. The facility consists of approximately 274,000 square feet of buildings located on approximately 20 acres of property.

The site is bounded by residential properties to the south, light industry and residential properties to the west and a wooded area to the north and east.

C. Quantity and type of wastes and/or hazardous substances:

On June 13, 2012, Ohio EPA conducted an inspection of the facility which revealed the following regulated substances:

- Two sumps in a former paint kitchen area that contained paint/solvent.
- 20, 5-gallon containers. One, 5-gallon container was labeled as an Oxidizer.
- 8, 55-gallon drums. One, 55-gallon drum was labeled as Corrosive.
- Three electrical transformers labeled as containing less than 50 PPM PCBs. Two of the three transformers were found to be leaking. Estimated volume of each transformer is 100-gallons.
- One electrical transformer labeled as non-PCB dielectric fluid with a volume of 900-gallons.

D. Analytical data or other documentation on chemical characterization of wastes present:

No assessment activities have been completed on the regulated substances identified during the June 13, 2012 inspection due to property access related issues. However, it is strongly suspected that the paint and solvent found in the sumps of the paint kitchen is a hazardous waste (i.e., D001/D035). In addition, labeling on the 5-gallon and 55-gallon containers indicated Corrosive and Oxidizer.

E. Storage / condition of containers and wastes:

The 5-gallon and 55-gallon containers are located inside buildings at the site. However, the buildings are open and unsecure.

The electrical transformers are located outdoors and exposed to weather conditions. In addition, two transformers are actively leaking.

D. Proximity of population and population density:

The site is bounded by residential properties to the south, light industry and residential properties to the west and a wooded area to the north and east. Approximately 51 people reside within a half-mile and 228 people reside within one mile of the site.

3. Threats to Public Health and the Environment

A. Description of potential exposure to humans, animals or the food chain from hazardous substances or contaminants:

The site has unrestricted access. In addition, buildings are open and unsecure. During the June 13, 2012 inspection, Ohio EPA documented trespassing as evidenced through acts of vandalism at the facility.

B. Actual or potential for releases:

During the June 13, 2012 inspection, Ohio EPA documented that the electrical transformers were leaking as evidenced by oil staining on the concrete pad and soil.

The potential exists for additional releases from containers and other regulated substances through trespassing and acts of vandalism.

C. Threat of fire or explosion:

A threat of fire or explosion is believed to exist from on-site sources. Specifically, ignitable hazardous waste is suspected in the sumps of the paint kitchen.

4. Assessment of Environmental Hazards and Proposed Response Actions

Description of hazards (real or potential) posed by site and what actions should be undertaken to reduce or eliminate hazard:

A. Uncontrolled releases of regulated substances at the site may pose a threat to human health and the environment. A threat of fire or explosion from on-site sources is believed to exist due to the presence of suspected ignitable hazardous waste.

To prevent further release or exposure to regulated substances and to eliminate the fire/explosion hazard, all regulated and hazardous substances should be adequately characterized, removed and disposed.

B. To prevent further release or exposure to regulated and hazardous substances, the following items should be evaluated and mitigated:

- All containers,
- Sumps and trench drains, and
- Electrical transformers.

5. Chronology of Events

2/11/09: Ohio EPA inspection of facility.

6/15/09: Ohio EPA NOV letter.

4/26/10: Ohio EPA inspection of facility.

6/13/12: Ohio EPA inspection of facility.

6. Index of Documents

Attachment 1: Figures depicting site location, site features and parcel information.

Attachment 2: Ohio EPA June 15, 2009 NOV letter.

Attachment 3: Ohio EPA February 11, 2009; April 26, 2010 and June 13, 2012 field notes.

7. Contact

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frank.zingales@epa.state.oh.us